

**MEMO ENDORSED**

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July 9, 2008

BY FACSIMILE

Honorable P. Kevin Castel
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2260
New York, NY 10007-1312

USDS SDNY
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Re: Michael Santangelo v. Warden Bailey, et. al.,
08-CV-4556 (PKC)(JCF)

Dear Judge Castel:

I am the Assistant Corporation Counsel assigned to the above-referenced action. I write to respectfully request that defendants' time to respond to the Complaint be extended from June 24, 2008 to August 8, 2008. This is defendants' first request for an extension of time in this matter. The additional time is necessary to interview the named defendants and determine issues of representation pursuant to General Municipal Law 50-k(2), as well as to conduct an investigation into plaintiff's allegations. After numerous unsuccessful attempts to reach the plaintiff by phone at the shelter he listed as a residence, I have been unable to obtain plaintiff's consent for this request.

Thank you for your consideration of defendants' request for an extension of time in this matter.

Respectfully Submitted,


Michael Suarez (MS 5038)
Assistant Corporation Counsel

cc: Michael Santangelo, T/N Michael Bonano, *pro se*
520 Gates Avenue
Brooklyn, New York 11216

7/11/08
Application granted.
SO ORDERED.
James C. Francis IV
USMJ

Jul 9 2008 1:12 P.02

Fax: 2127880940

NYC LAW DEPARTMENT